

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

CLINGMAN & HANGER	§
MANAGEMENT ASSOCIATES,	§
LLC, as Trustee of the Furie	§
Litigation Trust,	§
<i>Plaintiff,</i>	§
	§
v.	§
	§
KAY RIECK; LARS	§
DEGENHARDT; THEODOR VAN	§
STEPHOUDT; DAVID HRYCK,	§
REED SMITH LLP; THOMAS E.	§
HORD; MICHAEL ANTHONY	§
NUNES; STONE PIGMAN	§
WALTHER WITTMAN LLC, in its	§
own capacity and as successor by	§
merger to COGAN & PARTNERS	§
LLP; DAVID ELDER; BRUCE	§
GANER; SIERRA PINE	§
RESOURCES INTERNATIONAL,	§
INC.; and HELENA ENERGY, LLC,	§
<i>Defendants.</i>	§

Civil Action No. 4:21-cv-02698

**HELENA ENERGY, LLC’S UNOPPOSED MOTION TO EXTEND TIME TO
ANSWER**

TO THE HONORABLE CHARLES R. ESKRIDGE III:

Defendant, Helena Energy, LLC (“Helena”), respectfully requests an extension of time—to September 14, 2021—for it to answer, move, or otherwise respond to Plaintiff’s state-court petition which was removed to this Court in the above-styled and numbered civil action.

Plaintiff filed Plaintiff's Original Petition on August 6, 2021, and it was assigned to the 334th District Court of Harris County, Texas. Helena was served with a citation on August 11, 2021, and the case was removed to this Court on August 18, 2021. The return of service is on file with this Court (ECF no. 4), and the deadline for Helena to answer is September 1, 2021. *See* Fed. R. Civ. P. 81(c)(2)(A).

Due to the complexity of the matters at issue and the need for additional preparation time, Helena respectfully requests an extension of time—to September 14, 2021—to file an answer, move, or otherwise respond to Plaintiff's Original Petition.

Plaintiff does not oppose this extension.

WHEREFORE, premises considered, Helena Energy, LLC respectfully requests that the Court extend its deadline to answer, move, or otherwise respond to Plaintiff's lawsuit to September 14, 2021.

Respectfully Submitted,

PENDERGRAFT & SIMON, LLP

/s/ William P. Haddock

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Counsel for Helena Energy, LLC

Certificate of Conference

I hereby certify that prior to filing the above Helena Energy, LLC's Unopposed Motion to Extend Time to Answer, the undersigned conferred with opposing counsel, Robert Corn, regarding the relief sought in this Motion. He is unopposed to the requested extension of time.

/s/ William P. Haddock
William P. Haddock

Certificate of Service

I hereby certify that a true and correct copy of the above Helena Energy, LLC's Unopposed Motion to Extend Time to Answer has been served on the following counsel/parties of record in accordance with Fed. R. Civ. P. 5 and local rules for electronic filing and service on this 1st day of September 2021:

Service via CM/ECF –

Robert M. Corn, Counsel for Plaintiff
George M. Kryder, III, Counsel for Stone, Pigman, Walther, Wittman, LLC

/s/ William P. Haddock
William P. Haddock